

September 20, 2021

**VIA ECF**

Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Rm 618  
New York, NY 10007

**MEMO ENDORSED**

Re: Caraveo v. General Motors LLC, 1:21-cv-01009 (KPF)

Dear Judge Failla:

We represent plaintiffs Tato Caraveo and Brian Boner (“Plaintiffs”) in the above-captioned case and write pursuant to Section 2.E. of Your Honor’s Individual Practices to respectfully request a 30-day extension of time to file a Stipulation of Dismissal (or otherwise move to re-open the case).

- (1) the original deadline for the parties to file a Stipulation of Dismissal is September 24, 2021 [Dkt. No. 55];
- (2) there have been no previous requests for an extension;
- (3) no previous requests were granted or denied;
- (4) the parties respectfully request a 30-day extension in order to consummate their settlement;
- (5) Counsel for Defendant General Motors LLC consents to the requested relief.

Respectfully Submitted,

**s/jameshfreeman/**

James H. Freeman

*Counsel for Plaintiffs*

Application GRANTED. It is hereby ORDERED that the period of conditional discontinuance is extended through October 25, 2021.

Dated: September 20, 2021  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE